

## Appendix 1 - Newport City Council Draft Consultation Response Llwybr Newydd – New Path: Draft Wales Transport Strategy

Newport City Council agrees with ethos of Llwybr Newydd – New Path.

The draft strategy states that transport is the third-highest emitting sector in Wales, accounting for 17% of Welsh emissions in 2018. However, for the Newport area transport emissions are considerably higher than the Wales average with 45% of all carbon emissions in Newport originating from transport. This is the third highest in Wales with 20% of all carbon emission in Newport deriving from the M4. Therefore, Sustainable Transport is a key area of focus for the Newport area.

The draft strategy will further facilitate the move to sustainable travel options the council are advocating. This will improve air quality and reduce carbon emissions both locally and nationally and will support the local Air, Noise & Sustainability Action Plan and the local Carbon Reduction Plan.

In addition, this will support the implementation of the Newport Local Well-being Plan. The Plan has five cross cutting interventions that support the priorities and well-being objectives of the Public Services Board (PSB). Sustainable Travel is one of the five cross-cutting interventions.

Transport is a crosscutting function that facilitates access to a range of services and facilities, including employment, education and healthcare; therefore, it is imperative that the all members of society can access the network.

A more detailed response to the consultation is provided below by way of the consultation questions.

**Q1:** Do you agree with our long-term vision?

Strongly agree	<input type="checkbox"/>	Agree	<input checked="" type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>	Strongly disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
No opinion	<input type="checkbox"/>				

Please provide your comments:

20 Year Vision

*An accessible, sustainable transport system*

Newport City Council agrees with the long-term vision for an accessible, sustainable

transport system.

Climate change and air quality are key priorities for the council and we welcome the inclusion of sustainability in the overarching vision.

We welcome a 20-year horizon, which reflects the scale of the challenge and timescales to deliver the range of infrastructure required. This will assist the ability to plan effectively in order to provide stability and achieve greater efficiency. The provision of complementary funding programmes to match these timescales are critical to facilitate delivery.

The 20 Year vision presents a holistic view of transportation, which should have benefits for our local communities by improving public transport, reducing carbon emissions, improving air quality and reducing local noise pollution. National and local efforts to develop an accessible, sustainable transport system will also support the global efforts that are needed to combat climate change.

The challenge is how we capture and quantify these changes as they take place and also translate them into local pride and well-being.

The long-term vision should be influenced by short-term challenges, which appears to be recognised in this vision.

A 20-year timescale should capture a lot of transportation change and the associated reduction in carbon emission and air quality improvement that occurs organically as well as that which will require strategic projects. It is important that all sectors responsible for Wales's transport emissions are engaged in this.

The Strategy defines "Accessible" as "a transport system that is accessible to all because transport providers are taking action to address the barriers that can prevent people using transport including physical, financial and attitudinal barriers."

Accessible should also include ensuring that transport systems enable communities to access work, education, services and leisure.

In addition, the Welsh Government may want to consider adding the word "efficient" to the vision.

**Q2:** Do you agree with our 20-year ambitions?

Strongly agree	<input checked="" type="checkbox"/>	Agree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>	Strongly disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
No opinion	<input type="checkbox"/>				

Please provide your comments:

20 Year Ambitions

- *Good for people and communities*
- *Good for the environment*
- *Good for the economy and places in Wales*
- *Good for culture and the Welsh language*

Newport City Council agree with the long term ambitions and believe that these will support the delivery of the long-term vision and are pleased to see the wider aspects of well-being are being considered. This will support all the well-being goals contained in the Well-being of Future Generations (Wales) Act 2015.

**Q3A:** Do you agree with our 5-year priorities?

Strongly agree	<input checked="" type="checkbox"/>	Agree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
Disagree	<input type="checkbox"/>	Strongly disagree	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
No opinion	<input type="checkbox"/>				

Please provide your comments:

5 Year Priorities

*Priority 1: Planning for better connectivity*

*Priority 2: Public transport Services*

*Priority 3: Safe, accessible, well-maintained and managed transport infrastructure*

*Priority 4: Making sustainable transport more attractive and affordable*

*Priority 5: Support innovations that deliver more sustainable choices*

Newport City Council agree with all the 5 year priorities.

The priorities recognise the impact of transport related activity on the environment, with a hierarchy that reflects the primary ambition to reduce travel and, where travel is necessary, use modes of least environmental impact when possible.

Safe, attractive, well-maintained and well-managed transport infrastructure is a key priority for the council and is part of the key to facilitating community behaviour change and so allowing community movement to less polluting forms of transport. Priorities 1 & 2 will encourage more home working which may mean that public transport services may not have the critical mass to make them viable. So cleaner and quieter choices may require investment or subsidies to take people to their tipping point where they make a change that counts. Leading workers in behaviour change have identified that human behaviours change best where there is sufficient affordable infrastructure to encourage change. Health benefits associated with active travel in combination with quieter modes of travel

and improving air quality and carbon emissions should be an easy sell however, this message needs to be cultivated in communities.

Safety is at the heart of concerns over both air quality, carbon emissions and noise so being able to make quieter and greener travel choices must be inherently safe.

The Covid-19 pandemic illustrates the need to ensure the transport network can adapt to changing needs.

**Q3B:** Do you think that we have the right number of priorities or should these be further refined? If so, do you agree with the following three priorities:

1. We will reduce the need to travel.
2. We will encourage modal shift – when people need to travel we will encourage them to take fewer car journeys and use sustainable forms instead through supply of better services, and stimulating demand for them through behaviour change measures.
3. We will adapt out infrastructure to meet the challenge of climate change, and ensure our transport system is well-maintained, safe and accessible.

Please provide your comments:

Given the crosscutting nature of transport and many influences on provision, the use of 5 priorities is considered more appropriate than the 3 proposed. These are too narrow and don't reflect the societal elements, including cost of travel.

**Q4:** We have identified high level measures to aid us to capture our overall progress. Are these the right measures?

Yes  No

Can you suggest others?

In general, the metrics proposed reflect the main factors that influence modal choice. The introduction of new data collection activities, including a regular travel survey is welcomed. We are keen to capture the views of those who choose not to use active or public transport modes and address identified barriers.

Geographical accessibility and reliability are key influences on the propensity to use public transport, it is imperative these form part of the final measurement plan.

We suggest that measures for affordability and accessibility should be included. Other possible data sets to include could be:

- Proportion of petrol/diesel car journeys.
- Proportion of EV car journeys

- % reduction of petrol/diesel car journeys
- Proportion working from home.
- km of new cycle track built per annum.
- Railway station patronage – this is already recorded nationally and reported in the Newport LDP AMR.
- % of children walking/cycling to school.
- % of children using public transport to travel to school
- No. of electric charging points (private & public)
- % increase electric car journeys.
- % of electric cars.
- % of bus/train services reduced/increased.
- Delayed bus/train journeys.
- % of businesses with implemented travel plans
- Creation of a hybrid measure that captures the synergies between health, environment and transportation e.g. increased life expectancy / miles of cleaner air cycled / grams of carbon saved etc.

**Q5:** Do you think we should include specific targets for more people to travel by sustainable transport?

Yes  No

Do you have any suggestions for how we should do this?

Whilst measurement of key metrics are vital to assess the performance of the plan, the setting of targets requires careful consideration to ensure they are appropriate and achievable.

The medium and long-term impacts of Covid-19 on travel patterns / choices remain difficult to assess at present, particularly attitudes to the use of mass transit; However we would suggest long-term targets be added to the strategy to give the Welsh Government and other stakeholders goals to work towards.

We would suggest an overarching target for transport carbon emission and then other targets for each of the measures stated in the strategy. The targets would need to be at a Welsh level since each area is distinctly different and starts from a different point.

Any targets set need to consider the speed at which infrastructure will be implemented and the time that will be required for behaviour change to take place.

**Q6:** We have identified a set of actions to deliver the draft strategy. Are they the right actions?

Yes  No

Are there others that you can suggest?

The actions are quite high level so the development of the National Transport Delivery Plan (NTDP) will be key to the delivery of the vision, ambitions and priorities in the draft strategy. Stakeholders should be involved in the development of this plan.

The NTDP will be based on the Statement of Funds Available (SOFA). Adequate, long-term and accessible funding will also be crucial for the delivery of the strategy.

In addition, we would also agree and endorse that the South East Wales Transport Commission (SEWTC) Recommendations are also a basis for the changes that take place in the Newport and South Wales area.

**Q7:** We have set out mini plans for each transport mode and sector. Have we identified the key issues for each of these?

Yes  No

Do you have any comments on these?

#### **Active Travel**

The council broadly support the emphasis to priorities active travel schemes. However, the re-appropriation of road space needs to be considered in more detail.

The strategy advocates the increase of EV vehicle usage to assist with decarbonisation, however the active travel section (page 68) states that active travel will be facilitated through roads being closed. This may seriously disadvantage people who have, or may find themselves with access and mobility issues. In addition, people who may have switched to EV may find they may be prevented from having a vehicle close to their property.

As a council, we would advocate an 'integration' of active travel modes with vehicle and EV infrastructure for domestic locations in particular.

Segregated bus and cycle lanes in city centres could restrict private cars but the central areas should only closed to vehicles completely where this would not compromise disabled people or deliveries.

#### **Roads, Streets & Parking**

##### Default Speed Limits

Newport City Council broadly welcomes any initiative that can deliver safer streets, improve air quality and reduce noise pollution. However, this proposal has the capacity to impact greatly of the lives of our communities.

Therefore, the importance of capturing public opinion and support for this proposal is

paramount. The proposed use of the Wales Omnibus Survey to capture data following the completion of the national communications campaign is seen as an appropriate measure.

Currently, traffic authorities have powers to vary speed limits on their local road network, including the introduction of 20mph speed limits where considered appropriate. A potential variation of a speed limit in Wales would be assessed in line with current standards represented by Welsh Government Circular 24/2009 "Setting Local Speed Limits in Wales".

Circular 24/2009 is explicit about the speed limit in built-up areas and the circumstances in which 20mph speed limits can be imposed.

With targeted introduction based on data, road users have generally embraced these reductions in speed limit and Newport has generally high compliance in these zones.

The 20mph Default report focuses on building support for this initiative, which will start with a national conversation.

To ensure road user "buy in" with this national approach, strong communications from Welsh Government to educate and inform all road users on the rationale and promotion of likely benefits is paramount.

This process must be a robust and comprehensive communication strategy led by Welsh Government, with Local Authority participation, and fully completed before it falls to local authorities to deliver at a local highway authority level.

The proposed "simplifying" of the TRO process would be welcomed as will a review of the aforementioned policy and guidance documents. Early engagement via the Pilot Settlements Project is a sensible approach. However, with the deadline for applications to the pilot scheme 23rd December with an anticipated commencement of pilots on the 1st April, confirming the application process early December will likely preclude Newport and many other Councils from taking part.

There are concerns regarding enforcement of the new speed limits and the expectation on the Police/GoSafe to adapt to the application of 20mph. There needs to be confidence that appropriate funding is available to the Police/GoSafe to provide commensurate levels of enforcement.

Lack of enforcement will likely result in community expectation on local highway authorities to make these roads "self-enforcing" through widespread introduction of traffic calming measures.

The 4 stages of action hierarchy for non-compliance sites places the responsibility on the LA and Community Road Watch with no expectation of Police or GoSafe intervention. It is felt that this reflects the likely limited enforcement that 20mph will receive across Wales.

The recommended publication of design guidance on typical engineering measures is welcomed and is especially important where there is strong community engagement.

The recommended Welsh Government fund for communities to plan, design and implement changes to their streets delivers benefits of community-based participation and the creation of quality public spaces that contribute to people's health, happiness and wellbeing.

However, experience has shown that when awarding grant funding direct to communities, it is extremely difficult to control aspirations within road safety guidelines.

Therefore strong Welsh Government guidance via toolkits and confirmation of statutory processes to applicants will be necessary as part of any grant award to communities. Early local highway authority involvement/ support should be mandatory for any successful community grant application

The recognition that local authorities will require additional resources from Welsh Government to enable these changes is acknowledged. This is especially important due to the need to ensure every authority can meet the “whole of Wales” implementation date, which will be challenging.

#### Pavement Parking

Newport City Council broadly welcomes any initiative that can deliver safer streets and the objectives for active travel and inclusive mobility for all road users.

However, roadside parking in all the city's wards is at a premium and lack of parking provision is already a source of community tension. This proposal has the capacity to impact greatly on the lives of the city's communities.

Therefore, the importance of capturing public opinion and support for this proposal is paramount. The proposed use of the Wales Omnibus Survey to capture data for the roll out is appropriate but it is questionable why this will be undertaken before the campaign to inform the public and not after, to gain a more informed view of public opinion. A launch announcement followed by a short campaign does not seem in step with the effort to gain public opinion on 20mph.

The use of subordinate legislation that adds the offence of pavement parking to the current list of parking offences enforced by local authorities under the TMA 2004 would seem a sensible approach and is supported by this authority. However, the impact on resources will be significant as enforcement will be required across the majority of the city's highway network. Whether the Civil Parking Enforcement service will remain cost neutral in the future remains questionable.

Where it is necessary to permit pavement parking to take place, local authorities should indicate this so that drivers are informed where parking on the pavement is allowed. Traffic Regulation Orders (TRO's) will be required to define these bays. Therefore, there would seem to be significant staffing, legal, signage and road marking costs in both identifying and implementing these measures.



The report states “As with civil parking enforcement generally, most additional costs would be mitigated through the payment of such penalty charges the authority may see fit to issue to achieve compliance, but some additional funding may be required” It is clear that this initiative is seen as “self-funding” along the same lines as CPE. However, where additional costs are incurred at initial set up, it is the authority’s position that any additional costs, should be met by Welsh Government.

The lack of a definitive measure of obstruction does raise some concern as it will inevitably create or give the impression of inconsistencies of enforcement.

Also, the statement within the report “There will be places, for example narrow residential streets with no off-street parking, where some parking on pavements will need to be tolerated “highlights the inconsistency. If this is a measure to be applied, the vast majority of known problem areas within our communities will be exempt from enforcement.

It is therefore felt that the position stated within the report, although laid out in great detail in reflection of the new powers, requires further clarification to ensure equitable use of these new powers. The lack of clarity on what is obstruction and where permitted obstruction should be tolerated has the capacity to bring the authority into direct confrontation with the communities we seek to serve.

The report also seeks to deliver statutory guidance, which will ensure consistency across Wales but also allow some flexibility to adapt to local conditions. It is anticipated that, following this, these concerns will be addressed

There is also concerns over “displaced” vehicles as a result of new TRO’s. The report seems to place responsibility on local authorities “ More on-carriageway parking may also be needed to cope with the parking displaced from pavements”

With the majority of our housing estate “on street” parking at over capacity, it is unclear how additional on street parking can be created to accommodate displaced vehicles. This again creates an expectation of the authority, which in the vast majority of situations will be undeliverable.

A sharp increase in the number of gardens converted to parking spaces in enforcement areas would seem likely. Experience in the city has shown that the combined effect of numerous households paving their gardens can increase the risk of localised flooding and has the capacity to impact on the Strategy Report priority to manage surface water and flood risk.

Although regulations came into force in 2013 regarding the use of porous materials in such cases, non-compliance by householders will likely be widespread.

The report states “A period of 9 months from October 2021 to July 2022 has been allowed for local authorities to prepare for the commencement of enforcement operations, including public engagement on local policies, the making of any essential TROs to indicate areas of permitted parking or to increase on-carriageway supply, and the establishment of

any additional resources that will be needed”

Recent experience in the resourcing, communications and delivery of Civil Parking for the city of Newport has shown that to deliver a project of this size, complexity and potential contention, 9 months lead in time is insufficient

#### Un-adopted Road Network

The strategy commitment to help local authorities adopt unadopted roads over the next 5 years is welcomed by Newport, as is the report into the impact and scale of the un-adopted road network in Wales

The city has circa 18km of un-adopted “private streets” that cover all the categories identified in the report, with the likely cost of upgrading them to adoptable standards currently at circa £11m. Although it is accepted that many of the roads would be seen as low priority should funding be made available, it does show the extent of the problem for our communities who rely on these roads to access goods and services

#### Manage the allocation of parking in order to drive modal shift to public transport and active travel

This commitment is one of the 5-year priorities within the strategy. Newport City Council does not support the introduction of Work Place Parking Levies. With “in work poverty” already an issue for the city, stalled wage increases and costs likely to be passed by businesses to employees, this is unsupportable. Additionally, more clarity is required on the affect this would have on attracting businesses to the city and staff recruitment/retention.

#### Develop a strategy for equitable road charging in Wales in partnership with local authorities

The strategy states that Welsh Government will have introduced road charging in urban areas by 2040, where there is poor air quality and/or congestion. The council has previously provided its position on the introduction of road charging within the City of Newport to Welsh Government and via the SEWTC. The Council is aware of the recommendations of the report “An Independent Review of Road User Charging in Wales” However, such a move to introduce road charging cannot be supported by this Council.

#### Road network gives greater priority to public transport and active travel

Newport supports the provision of greater priority to public transport and active travel on the city’s highway network. However, for these measures to be successful in creating a modal shift, greater investment must be made into a public transport system that is fit for purpose, affordable and available at or before the introduction of measures to drive behaviour change. It is not enough to simply build capacity into the highway network and not address the steady decline in the services that run on them.

As set out in the five-year priorities, the authority supports the intention to address road congestion, improve journey time reliability and ensure highway resilience through the promotion of asset management strategies and reduction in maintenance backlog.

## **Taxis and Private Hire Vehicles**

It is felt very ambitious for all vehicles to be Zero emission by 2028. Though the Council very much support this ambition, it is felt both the trade and local authorities will need significant support to meet this target.

The use of charging points at taxi ranks is clearly not viable; as such, the charging infrastructure will be required to be considered. For many of our Licensed drivers they will not have the luxury of a driveway to charge vehicles, so this needs to be carefully considered.

However, clearly charging points and vehicles are continuing to evolve as such this will be less of an issue as we approach 2028 where charging points will be able to achieve rapid charging and vehicles will be able to undertake more miles per charge.

Newport City Council fully supports the revision of how both Hackney Carriage and Private Hire will operate in the future. Using legislation dating back to 1847 is simply not fit for purpose in 2020. Newport City Council strongly supports the develop of national standards for taxis and PHVs in Wales, including such issues as the suitability of applicants / licence holders; vehicle safety measures; vehicle testing; record keeping of journeys; driver and operator training.

However, it is important the national standards meets all Local Authorities requirements and not simply based around a Cardiff model. However, the council supports national standards and it is felt that local authorities are in the best position to both administer and enforce these proposed standards.

Currently as regulators, we do not have the necessary powers to undertake effective enforcement as such this detriment to both the professional trade and the travel public, so once again, we fully support the proposed changes.

Clearly, the Council fully supports maintaining a national licensing database and public register to aid consistency and promote public safety, though this is currently being undertaken via the NR3 database.

Newport City Council fully supports a 'one-tier' taxi licensing system. However, despite the Council's full support for this system, clearly consideration regarding Wheelchair Accessible Vehicles must be considered in the proposed national standards.

In regard to multiple seat taxis for example 8 seater vehicles, the proposed national standards should consider a safe and efficient "pool" system to allow customers to share vehicles taxis, this will decrease the number of journeys vehicles are undertaking.

There is much within the strategy regarding Taxis, that clearly Newport City Council supports but there seems to be a lack of clarity regarding public service vehicles (PSV). Clearly, if the proposed strategy was implemented this could lead to see an increase of PSV vehicles undertaking more traditional "taxi" work.

### General

There is also a need for an integrated approach to transport provision to include looking at charges and ticketing across train, bus, parking etc to encourage people to travel in a more sustainable way.

Robust and implemented travel plans for new developments and businesses should also be a consideration to support more sustainable travel options.

**Q8:** We have shown how transport will use the 5 ways of working set out in the Well-being of Future Generations (Wales) Act 2015. Do you agree with this approach?

Yes  No

Do you have any comments?

The five ways of working have been fully considered in the draft strategy.

Are there any further comments that you would like to make on Llwybr Newydd: a new Wales transport strategy?

Please enter here:

The strategy proposes a greater role for Transport for Wales (TFW), please can we note many transport powers are vested with local authorities.

Before we start to implement the strategy, we need to understand the baseline position with the right measures and targets contained within the plan at a local level. This would give the Welsh Government and stakeholders which project and areas of focus there needs to be.

When the NTDP is developed the work streams associated with Llwybr Newydd need to be unambiguous and uncomplicated so that all stakeholders are clear about direction and outcomes. It is also vital that the five ways of working are applied when developing the NTDP, e.g. looking to the long term, prevention, involving people, collaboration, taking an integrated approach and ensuring all aspects of well-being are considered.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: